

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

PUBLIC REPRESENTATIVE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO UNITED STATES POSTAL SERVICE
(PR/USPS-6-12)

(August 24, 2011)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's interrogatories PR/USPS- T1- 1-5, dated August 1, 2011, are hereby incorporated by reference.

Respectfully Submitted,

/s/ Tracy N. Ferguson
Tracy N. Ferguson
Public Representative for
Docket No. N2011-1

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PR/USPS-6

Is there a universal selection mechanism applied to every retail postal facility in the United States for inclusion on the initial Retail Access Optimization Initiative (RAOI) list? (See USPS LR-2)

- a. If so, please provide the mechanism and explain the application in detail.
- b. If not, please explain the initial selection process?

PR/USPS-7

Please explain the process for isolating specific locations for discontinuance. Please point to specific criteria that will be used to differentiate between post offices that will remain open and those that will be closed.

PR/USPS-8

What is the benefit to the RAOI versus the current discontinuance and consolidation procedures?

PR/USPS-9

How does the RAOI improve the clarity of the Postal Service's interpretation of "maximum degree of effective service?"

- a. How does the RAOI provide important postal service field employees and officials the direction needed to clearly effectuate postal retail location closures in a manner that conforms to applicable law?
- b. What is the minimum amount of service this would require and under what circumstances?
- c. How can the Postal Service assure maximum and efficient service to consumers if it cannot say how many closures will result or where those closures will actually be?

PR/USPS-10

Please confirm there is a flowchart that allows Postal Headquarters oversight concerning the end-to-end process of discontinuance procedures for postal retail locations.

- a. Have the postal retail locations listed in USPS LR-2 been entered into this database?
- b. Please provide a generic, non-location specific, version of this flowchart that identifies at each step of the process the postal official responsible for making the relevant decision.

PR/USPS-11

In response to POIR No. 1 Question 1, the Postal Service states it does not solicit demographic data from customers that might reveal such information as customer's age, gender, racial or ethnic identification, or income, further stating that "[t]he Postal Service does not require discontinuance review coordinators to access U.S. Census Bureau data that may relate to the service area of a retail facility being considered for discontinuance." The following questions pertain to the importance of the Postal Service collecting data to make informed decisions that prevents unnecessary discrimination.

- a. Does the Postal Service consider social demographic information such as age, gender, racial or ethnic identification, and income unimportant to the discontinuance process?
- b. Please confirm that many of the customers of the Postal Service have no other postal access options to letter mail.
- c. Please discuss how the Postal Service's monopoly on letter mail impacts the Postal Service's ability to optimize retail access.
- d. Please discuss how the Postal Service's monopoly on letter mail impacts the Postal Service's ability to decrease retail access.
- e. Has the Postal Service performed any studies relating demographic data, such as that identified in POIR No. 1 Question 1, to the importance of postal access? If so, please provide such studies.
- f. Has the Postal Service undertaken any studies that link demographic data, as identified in POIR No. 1 Question 1, to broadband internet availability and communication access options? If so, please provide such studies.

PR/USPS-12

The USPS-LR-2 tabs "incsd1_migrate" "new_2hrs" "stations" and "retail_annexs" identifies 36 post offices under review for closure located the state of Alaska. On August 23, 2011, after a meeting with U.S. Senator Begich of Alaska, Alaska's USPS District Manager, Diane Horbuchuk, announced that 25 of the listed post offices have been removed from the RAOI list. See <http://www.businessweek.com/ap/financialnews/D9PAHAU81.htm>

- a. Please provide an explanation for why the Postal Service removed 25 of the 36 Alaskan facilities from the RAOI list.
- b. Please explain why the remaining 11 facilities were not removed from the RAOI list.
- c. Please confirm that all of the 24 Alaskan facilities identified in tab "new 2hrs" earned revenue of less than \$10K, the Postal Service's lowered revenue threshold for that state. See "FY Offices under \$100,000 by Technology.xls" tab "Emoves (Manual)."
- d. Will the other states' facilities be re-examined in the same fashion?
- e. Who ratifies changes to the RAOI list, and upon what key factors does that person, or team of persons, rely?
Please describe the process for updating the Commission and intervening parties of adjustments to the facilities identified in USPS-LR-2.